

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Durable Coatings - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region V**

Subject: **POLREP #2**
 Time-Critical Removal Action Continues
 Durable Coatings
 C521
 Northville, MI
 Latitude: 42.4079705 Longitude: -83.4691435

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Date: 9/23/2011

Reporting Period: 9/19/2011 - 9/23/2011

1. Introduction

1.1 Background

Site Number: C521

D.O. Number:

Response Authority: CERCLA

Response Lead: EPA

Contract Number:

Action Memo Date: 8/25/2011

Response Type: Time-Critical

Incident Category: Removal Action

US EPA RECORDS CENTER REGION 5



412878

NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/8/2011	Start Date:	9/8/2011
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510557	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The site consists of a 4.15-acre parcel bordered by Northville Road and Hines park to the west, commercial properties to the north and south, and railroad tracks and residential homes to the east. The site is the former location of Durable Coatings Corporation and includes a building with an office area and a number of other additions totaling 57,864 square feet. The Durable Coatings Corporation used the site for electro-coating services, including rust-preventative coating, corrosion-resistant coating, and metal finishing services. The site is no longer operational.

1.1.2.1 Location

The site is located at 16500-16580 Northville Road in Northville, Wayne County, Michigan 48168 in a mixed residential/commercial/industrial area. Coordinates for the site are 42.3945 degrees north and -83.4681 degrees west. The Middle Rouge River is immediately south of the site and is approximately 60 feet from the building. Several other water bodies are located within a one-mile radius of the site, including Waterford Pond and Phoenix Lake. Meads Middle School is located approximately 750 feet to the northeast of the site.

1.1.2.2 Description of Threat

The Toxicity Characteristic Leaching Procedure (TCLP) results for a drum at the site which contains methyl ethyl ketone (MEK) were 17,000 milligrams per liter (mg/L) which is 85 times above what is characteristically hazardous for MEK. This same drum has a flash point of 50 degrees Fahrenheit (°F); 90°F below what is characteristically hazardous. In addition, a corrosive substance in a drum at the site had a pH of 14.0 standard units (S.U.) A drum marked as "hydrochloric acid" produced visible acid vapor fumes when opened. Fumes from this drum produced a pH of zero S.U. on field screening equipment.

The site building is in a state of disrepair. Numerous holes in the roof and walls of the building allow precipitation to enter. This precipitation will lead to the further degradation of site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete which can lead to trespassers. There are visual signs of trespassing throughout the property. Trespassers have the potential to cause an accidental or purposeful release to the environment. The Middle Rouge River lies approximately 60 feet from the building.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

During a initial site visit with MDEQ, U.S. EPA observed the worker wearing no personal protective equipment (PPE), signs of liquid waste on his hands and clothes, and was smoking cigarettes. When questioned, the worker stated that he had been transferring contents of

containers into other containers and that he had no Occupational Safety and Health Administration (OSHA) hazardous waste training. Multiple signs of spills were observed in the building including puddles and pools of liquid waste on the floor.

U.S. EPA conducted a site assessment on June 17, 2011 of Durable Coatings. U.S. EPA documented the presence of over 390 containers, including drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers. Labels on some containers indicated the potential presence of hydrochloric, acetic, nitric, sulfuric, and phosphoric acids, sodium hydroxide; potassium hydroxide; n-methylene chloride; dichloromethane; propane; oxygen; acetylene; glycol ether; and cellulose solvent.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

U.S. EPA met MDEQ at the Durable Coatings Site on May 19, 2011 to conduct a site walk-through. U.S. EPA observed numerous drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers strewn throughout the site. A large number of the containers were observed to be unlabeled and unsecured. One worker was on site. The worker was wearing no PPE, had visual signs of waste on his hands and clothes, had no OSHA hazardous waste training, and was smoking cigarettes. Multiple signs of spills were observed in the building including puddles and pools of liquid waste on the floor. The worker stated that he was preparing the waste for disposal and stated that he had been transferring contents of containers into other containers.

U.S. EPA conducted a site assessment on June 17, 2011 of Durable Coatings. U.S. EPA documented the presence of over 390 containers, including drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers. Labels on some containers indicated the potential presence of hydrochloric, acetic, nitric, sulfuric, and phosphoric acids, sodium hydroxide; potassium hydroxide; n-methylene chloride; dichloromethane; propane; oxygen; acetylene; glycol ether; and cellulose solvent.

2.1.2 Response Actions to Date

On Monday, September 19, 2011, U.S. EPA continued consolidating site containers to the drum staging area. U.S. EPA began cutting up RCRA empty containers and placing them in a roll-off box for disposal. Air monitoring was conducted during site activities and no readings above action levels were observed.

On Tuesday, September 20, 2011, U.S. EPA continued consolidating site containers to the drum staging area. U.S. EPA also continued cutting up RCRA empty containers and placing them in a roll-off box for disposal. Air monitoring was conducted during site activities and no readings above action levels were observed.

On Wednesday, September 21, 2011, U.S. EPA shipped a 30 cubic yard roll-off box of RCRA empty containers to Woodland Meadows Landfill in Wayne, Michigan for disposal. U.S. EPA logged and identified drums and containers for hazard categorization (hazcatting). U.S. EPA continued cutting up RCRA empty containers and placing them in a roll-off box for disposal. Air monitoring was conducted during site activities and no readings above action levels were observed.

On Thursday, September 22, 2011, U.S. EPA began collecting samples from containers for

hazard categorization. Workers donned Level B protection and collected a total of 79 liquid samples from drums on site. U.S. EPA conducted air monitoring during work activities. Slightly elevated levels of carbonmonoxide were detected during drum sampling activities due to the motor on the air trailer. The air trailer was moved outside the building to resolve the issue. No other readings above background were observed.

On Friday, September 23, 2011, U.S. EPA completed sample collection from drums and miscellaneous containers. Workers donned Level B protection and collected samples from the remaining drums and containers for a total of 137 samples. U.S. EPA continued cutting up RCRA empty containers and placing them in a roll-off box for disposal. Air monitoring was conducted during work activities and no readings above action levels were detected.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Enforcement Team continues to look at PRPs. General Notice Letters have been sent to two PRPs along with 104e letters. Means of reimbursing U.S. EPA's cleanup costs are being looked into.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
R-22 Refrigerant	Cylinders	2	N/A	Recycled at Golden Refrigerant, Livonia, MI	
R-22 Refrigerant	lbs	22	N/A	Recycled at Golden Refrigerant, Livonia, MI	
RCRA Empty Containers	Tons	3.22	T08958		Waste Management Woodland Meadows Landfill, Wayne, Michigan

2.2 Planning Section

2.2.1 Anticipated Activities

Begin hazcatting samples collected from containers.

Continue cutting up RCRA empty containers for disposal.

Collect waste stream samples for laboratory analysis.

2.2.1.1 Planned Response Activities

Segregate containers

Sample containers

Combine compatible wastes into appropriate waste streams

Waste disposal

2.3 Logistics Section

Not Applicable.

2.4 Finance Section

2.4.1 Narrative

An Action Memorandum was signed by the Superfund Division Director on August 25, 2010 to conduct a fund-lead time-critical removal action at the site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$33,796.47	\$166,203.53	83.10%
TAT/START	\$20,000.00	\$0.00	\$20,000.00	100.00%
Intramural Costs				
USEPA - Direct	\$81,380.00	\$0.00	\$81,380.00	100.00%
USEPA - InDirect	\$74,000.00	\$0.00	\$74,000.00	100.00%
Total Site Costs	\$375,380.00	\$33,796.47	\$341,583.53	91.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

Ed Kiernicki

2.6 Liaison Officer

Not Applicable.

2.7 Information Officer

2.7.1 Public Information Officer

Not Applicable.

2.7.2 Community Involvement Coordinator

Not Applicable.

3. Participating Entities

3.1 Unified Command

Unified Command is not utilized at the site.

3.2 Cooperating and Assisting Agencies

MDEQ

4. Personnel On Site

ERRS – 4

START – 1

U.S. EPA – 1

5. Definition of Terms

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

CIC - Community Involvement Coordinator

MDEQ - Michigan Department of Environmental Quality

NCP - National Contingency Plan

OSC - On Scene Coordinator

START - Superfund Technical Assessment and Response Team

ppb - parts per billion

ppm - parts per million

RCRA - Resource Conservation and Recovery Act

U.S. EPA - United States Environmental Protection Agency

VOC - Volatile organic compound

WESTON - Weston Solutions, Inc

6. Additional sources of information

6.1 Internet location of additional information/reports

Not Applicable.

6.2 Reporting Schedule

Polreps will be issued weekly or as necessary.

7. Situational Reference Materials

Material Safety Data Sheets





